

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

JOHN STILES, a pseudonym,

v.

C.A. NO.: 21-cv-497-MSM-LDA

BROWN UNIVERSITY

**DEFENDANT BROWN UNIVERSITY'S**  
**MOTION FOR EXTENSION OF TIME TO RESPOND**  
**TO (1) PLAINTIFF'S VERIFIED COMPLAINT AND**  
**(2) MOTION FOR TEMPORARY RESTRAINING ORDER AND**  
**PRELIMINARY INJUNCTION**

Defendant Brown University (“Brown”) moves for an extension of time up to and including January 12, 2022 to respond to (1) Plaintiff's Verified Complaint and (2) Motion for Temporary Restraining Order and Preliminary Injunction (“Motion”). Currently, Brown's response to the Verified Complaint (ECF No. 1) is due on January 10, 2022, and its response to the Motion (ECF No. 10) is due on January 3, 2022.

Brown requests that its deadline for each responsive filing be extended until January 12, 2022 for the following reasons:

1. Brown's current response periods include the Christmas and New Year's Day weekends.
2. Brown's administrative offices closed for a holiday recess on December 22, 2021 and will reopen on January 4, 2022, which limits its counsel's ability to confer with Brown's client representatives during this twelve-day period.
3. In his Motion, Plaintiff, who has been accused of sexual assault by another student, challenges Brown's decision based upon its threat assessment review to place him on an interim suspension pending the completion of the disciplinary process.

4. As shown in the excerpt from Brown's 2021-22 academic year calendar attached as Exhibit A, the spring 2022 semester classes will start on January 26, 2022.

5. Brown's requested extension to January 12, 2022, for its responses to the Verified Complaint and the Motion, will allow the Court and the parties a two-week period to address the Motion before the start of the spring 2022 semester classes.

For the above-stated reasons, Brown requests that the Court grant its request for an extension of time up to and including January 12, 2022 to file its responses to Plaintiff's Verified Complaint and Motion.

BROWN UNIVERSITY

By its Attorney,

/s/ Steven M. Richard  
Steven M. Richard (#4403)  
Nixon Peabody LLP  
One Citizens Plaza, Suite 500  
Providence, RI 02903  
Tel: 401-454-1020  
Fax: 401-454-1030  
[srichard@nixonpeabody.com](mailto:srichard@nixonpeabody.com)

Dated: December 26, 2021

CERTIFICATE OF SERVICE

I certify that, on the 26th day of December, 2021, I filed and served this motion for extension of time via the Court's CM/ECF system.

/s/ Steven M. Richard